



Ian Cross <ian@lawinannarbor.com>

Jackson v. Corizon & Prime, et al - proposed protective order

Ian Cross <ian@lawinannarbor.com>

Thu, Dec 10, 2020 at 11:49 PM

To: Kenneth Willis <kenneth.willis@cseb-law.com>, Daniel Corbet <Daniel.Corbet@cseb-law.com>, Larry Margolis <larry@lawinannarbor.com>

Ken,

Now that your protective order has been entered, when do you expect to produce the documents we requested?

We have some issues with your responses to our discovery requests. Your responses essentially provide no documents and no information. We would like your client to provide a substantive answer to our interrogatory. If Prime was providing healthcare services, including surgery, to jail inmates under contract, Prime must have known the identity of the person authorized to decide when/whether a jail inmate gets surgery.

RTP 1 and RTP 2 request electronic messages that were sent from or to your client's employees concerning Mr. Jackson's treatment. Prime should have access to its employees' work email accounts. At the very least you should have access to the accounts of the Prime employees who were never stationed at the jail, such as Dr. Kansakar.

RTP 3 and RTP 4 request any training and/or orientation materials that were provided by Prime to certain Prime employees. While the jail may have provided additional training materials to Prime employees, we are asking for any materials provided by your client.

We may want to follow up with you on RTPs 8 and 10 after we see the contract with the county and know who was responsible for what.

Regarding depositions, Devlin is planning to depose the Plaintiff in late January. What is your availability the week of Jan 18?

Thanks,
Ian

On Wed, Nov 18, 2020 at 2:55 PM Kenneth Willis <Kenneth.Willis@cseb-law.com> wrote:

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